

December 18, 2012

Kari Dolan, Manager
Ecosystem Restoration Program
Department of Environmental Conservation Watershed Management Division
1 National Life Drive, Main 2
Montpelier, VT 05620-3522

Dear Ms. Dolan:

IBM appreciates this opportunity to provide comments on the Act 138 draft report designed to prepare Water Quality Remediation, Implementation, and Funding options for the State of Vermont Legislature.

IBM supports the State's desire to provide clean water to all Vermonters. It is important to educate and provide outreach which elevates the public's consciousness of the importance of making clean water a priority. It is also important, given the constrained monetary resources of the state, that actions taken to mitigate pollution discharges be the most effective for the resources expended.

We believe the section describing the enhancement of current programs to support clean water is an illustrative description of effective, efficient pollution control that would utilize existing programs and processes to improve overall water quality. A central organized water board/group/entity will have the ability to organize and spend funds in the most suitable areas where the best overall reductions can be realized.

Low Impact Development (LID) techniques and innovations should be emphasized as an example of effective, efficient control methods that can be utilized and enhanced to enable achievement of reduced pollution discharges. In addition, IBM and others have been working to reduce pollution absent any formal directive from regulatory bodies. Those efforts at IBM have been recognized by receiving Governor's Environmental Excellence Awards in recent years. Going forward, it is important to recognize those efforts that have taken significant resources to implement with the development of any new regulatory restrictions.

Again, IBM is supportive of the States efforts to improve water quality. However, we must balance that with a consideration of the financial impacts on all of Vermont's business and future growth. It is a daunting task but the environmental staff at IBM is willing to provide technical expertise and guidance to enable the achievement of clean water for all Vermonters.

Sincerely,

Thomas Jagielski,
IBM STG Environmental
Affairs Focal Point Manager